

receive it no later than 5pm on Monday 31st March 2014

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Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012.

Publication Draft - Representation Form

PART A: PERSONAL DETAILS

* If an agent is appointed, please complete only the Title, Name and Organisation in box 1 below but complete the full contact details of the agent in box 2.

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)
Title	Ms	
First Name	[REDACTED]	
Last Name	Ward	
Job Title (where relevant)		
Organisation (where relevant)	Tong Village Community Association	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
Line 4	Bradford	
Post Code	BD4 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 28 TH MARCH 2014

Personal Details & Data Protection Act 1998

Regulation 22 of the Town & Country Planning (Local Development) (England) Regulations 2012 requires all representations received to be submitted to the Secretary of State. By completing this form you are giving your consent to the processing of personal data by the City of Bradford Metropolitan District Council and that any information received by the Council, including personal data may be put into the public domain, including on the Council's website. From the details above for you and your agent (if applicable) the Council will only publish your title, last name, organisation (if relevant) and town name or post code district. Please note that the Council cannot accept any anonymous comments.

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PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	3,4,5	Paragraph	5.3 ,5.4, Key Diagram- Location Straregy and Key pg 66/67 Figure BD1 SPATIAL Vision Diagram 4.1.3	Policy	Sub-Area Policy BD1 C 1. Sub-area Policy BD1 E 1. Sub-area Policy HO2 B 2 Policy EN4 A
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	No
4 (3). Complies with the Duty to co-operate	Yes		No	

5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible.

If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Grounds of Representation

I contend that the plan is unsound on the following grounds:-

1. It is not in accordance with National Policy with regards to Greenbelt
2. It is not positively prepared
3. It is not justified
4. It is not effective

Particulars of the Representation

1. Greenbelt.

The whole of the urban extension at Holme Wood situated within the Tong Valley in South East Bradford, sites SE099 and SE100 on the SHLAA map, are on Greenbelt land. National policy on the issue of Greenbelt land is very specific. Paragraphs 79 and 80 PF of the National Policy Planning Framework states

"79. The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

80. Green Belts serve five purposes:

to check the unrestricted sprawl of large built-up areas;

To prevent neighbouring towns from merging into one another;

to assist in safeguarding the countryside from encroachment;

to preserve the setting and the special character of historic towns; and

to assist in urban regeneration by encouraging the recycling of derelict and urban land."

This should be expressly set out in the Strategic Section relating to Green Belt in Bradford's Core Strategy plan.

Were the Urban Extension in Holme Wood to go ahead, I believe it would contravene all of these five purposes:-

1. Bradford would merge with both Leeds and Kirklees Metropolitan areas as they closely border the Tong Valley.
2. The countryside within the valley would not only be significantly encroached upon but in my opinion violated by this housing blot! Ancient Woodland within the valley, especially Black Carr Woods, the most ancient Oak Woodland within the Bradford MDC, (see the Bradford Growth Assessment Regional City of Bradford: November 2013) would be endangered by a large settlement near its borders. Wildlife corridors must be preserved in order for wildlife within the countryside to survive. A big increase in pollutants and the water run off from so much hard standing generated by

a large-scale housing development would greatly increase the jeopardy to the survival of this woodland. Indeed, Section 5.4 of the Core Strategy Development Plan Document Publication Draft, outlines the value of woodland and trees. Section 5.4 106 actually states "the district has a relatively low level of woodland cover." S5.4 107 states that " less than 5% of Bradford is woodland compared to a national average of 10%." S5.4 110 states " Consultation responses identified ancient and semi-natural woodland and aged/veteran trees as clear priorities. Ancient semi-natural woodlands (dating back to 1600 or before) have immense biodiversity value but cannot be replaced once destroyed."

How, then, does this square with the building of the Holme Wood Urban Extension? The proposal for the Urban Extension clearly defies the wishes of the populace as expressed through the consultation process to preserve and conserve ancient woodland. Furthermore, the health and leisure benefits identified in this section re the effects of countryside and woodland areas on well-being will be nullified by the building of the Holme Wood Urban Extension as the natural landscape would be inevitably be degraded.

3. The historic setting of both Tong Village on one side of the valley and the Fulneck Moravian settlement on the other side would be severely compromised. Both derive their special quality as conservation areas by their unique position of being surrounded by open countryside. Indeed, this was remarked upon in the Tong Conservation Area Assessment document published by Bradford Council in December 2005 as being a quintessential feature of the village that must be preserved by the council. Section 4. Topography and Setting page 12 states that being " able to see each of these settlements helps to place the village in its urban commuter village context, although also being able to see that the nearest settlement is over a mile away and across a valley gives tong a stand-alone rural feel, and its setting an open and exposed air." It also observes that the " main approaches into the conservation area are along Tong Lane and at either end of the village the roadside is studded with mature trees which create a pleasant gateway into the village. In both cases the tree line peters out and views from the road open out into the fields." On the previous page, 11. it states that

"Much of Tong's uniqueness is derived from its relationship with its surroundings and the way the development of the village has responded to the topography."

This significant document sets out to laud the historical and landscape setting of the village of Tong as something worth preserving. It refers to the description of the sale of land in the village environs in 1943 by Bartle and Son (page 10) where Tong is described as " the one remaining example of the complete old English village and is the only typical manor to be found within the extensive area now embraced by the City of Bradford."

All of this would be lost and the heritage and setting of the area would be destroyed should the Urban Extension go ahead.

4. The whole of the Tong Valley is currently significantly used by a great many people for leisure and recreational purposes. Many of the businesses situated within the valley depend upon their location within it for their appeal. The livery stables and the riding schools would be severely compromised by the building of the Urban extension at the top end of the valley. The walkers and cyclists likewise would find their activities curtailed and their enjoyment of the area spoilt. Visitors are attracted to the two public houses, The Greyhound and The 6 Acres, Goodalls Ice Cream Parlour, Tong Garden Centre and Lane End Farm Shop because of their rural aspect. The valley is a rural idyll between two large metropolitan areas which the inhabitants of those areas can easily escape into for refreshment and relaxation. It is an idyll in an area of South –east Bradford which is largely devoid of any significantly open, green spaces. A significant economy depends upon its rural location.
5. It is our contention that Bradford Council has undervalued this rural jewel in their crown by neglecting to follow up on the observations made in the Tong Conservation Assessment document and by proposing the urban extension to Holme Wood. There is no signage in the valley on the Bradford side , unlike there is in the Leeds area of the Green Belt. Much more could be done to promote the area as a visitor attraction with a visitor centre and we would support the creation of a Countryside park there. As a Village Association we have done our utmost to promote village life through our diverse program of village events. Many from outside the area are attracted by our bi-monthly credit crunch lunches where we serve affordable 2 course lunches. Our Creative Tong events are popular as are the Astronomy events, Book Club, WI, MOTHER AND TODDLER GROUPS AND OUR ONE OFF CELEBRATIONS CELEBRATING SIGNIFICANT NATIONAL occasions. We act as custodians of a way of life based on a communal experience of life and not an impersonal, individual one. We attract people to our events because of this. We do not feel that this would be sustained by the urban sprawl proposed at Tong Lane end.

6. **Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).**

You will need to say why this modification will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We propose that all references and intentions to build an Urban Extension at Holme Wood are struck from this plan.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. Please be as precise as possible.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?

	No , I do not wish to participate at the oral examination
Yes	Yes , I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To convey a depth of feeling that cannot be entirely communicated within the confines of a written representation.

Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:	██████████ Ward on behalf of the Tong Village Community Association	Date:	28 th March 2014
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Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

Bradford Council would like to find out the views of groups in the local community. Please help us to do this by filling in the form below. It will be separated from your representation above and will not be used for any purpose other than monitoring.

Please place an 'X' in the appropriate boxes.



